

Supporting Statement A

Safe Disposition of Life-Limited Aircraft Parts

OMB 2120-0665

Summary of Changes:

The estimates in this information collection summary have increased due to the following:

- Updated estimates to the number of respondents to the collection
- Adding the § 45.16 burden to the ICR. The burden associated with this regulation was inadvertently missed in previous requests.
- Wage rates for respondents have been updated.

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

The installation of parts that have exceeded their manufacturer specified life-limit onto aircraft operating in the National Airspace (NAS) compromises the safety of the public who fly on those aircraft. The FAA has found life-limited parts that exceeded their operating limitations installed on aircraft through accident investigations, Suspected Unapproved Parts (SUPS) reports, and routine surveillance activities. To help prevent the installation of aircraft parts that have reached their life-limit, the FAA has instituted regulations that require persons who remove parts that have reached their life limit, to properly disposition of those parts. Additionally, when requested by a person required to disposition a life-limited part, the holder of a type certificate or design approval for a life-limited part must provide marking instructions or must state that the part cannot be practicably marked without compromising its integrity.

Title 49, United States Code (49 USC) § 40113, *Administrative*, empowers the Administrator of the Federal Aviation Administration to take appropriate actions the FAA considers necessary to carry out this part, including conducting investigations, prescribing regulations, standards, and procedures, and issuing orders.

49 USC § 44701, *General requirements*, empowers the Administrator of the Federal Aviation Administration (FAA) to promote safe flight of civil aircraft in air commerce by prescribing regulations and minimum standards in the interest of safety for inspecting, servicing, and overhauling aircraft, aircraft engines, propellers, and appliances.

49 USC § 44725, *Life-limited aircraft parts*, was enacted as part of the Wendell H. Ford Investment and Reform Act for the 21st Century (Public Law 106-181) over concerns with the use of life-limited aircraft parts that led Congress to pass a law requiring the safe disposition of these parts. This section required the FAA to conduct a rulemaking proceeding to require the safe disposition of life-limited parts removed from an aircraft. The rulemaking resulted in the 14 CFR part 43 requirements that are the subject of this information collection.

Title 14 Code of Federal Regulations (14 CFR), **part 43**, Maintenance, Preventive Maintenance, Rebuilding, and Alteration, prescribes maintenance requirements for aircraft having a U.S. airworthiness certificate, Foreign-registered civil aircraft used in common carriage or carriage of mail under the provisions of Part 121 or 135, and airframe, aircraft engines, propellers, appliances, and component parts of such aircraft. Additionally, this part applies to all life-

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limited parts that are removed from a type-certificated product, segregated, or controlled as provided in § 43.10.

14 CFR § 43.10, Disposition of life-limited aircraft parts. In paragraph (c) of this section, the FAA requires each person who removes a life-limited part from a type-certificated product ensure that the part is controlled using one of the methods described in the paragraph.

14 CFR §45.16, Marking of life-limited parts, when requested by a person required to comply with § 43.10 of this chapter, the holder of a type certificate or design approval for a life-limited part must provide marking instructions, or must state that the part cannot be practicably marked without compromising its integrity.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The collection includes both recordkeeping and reporting requirements as described below. This regulation requires that records be maintained showing the current status of the part regardless of time remaining, if any. Additionally, the regulation ensures positive control and safe disposition of all life-limited parts until they are mutilated or destroyed, after having reached their mandatory operating life limits, by preventing them from being accidentally installed.

Additionally, the collection requires the holder of a type certificate or design approval for a life-limited part must provide marking instructions or must state that the part cannot be practicably marked without compromising its integrity.

Recordkeeping Requirements covered under this IC include:

Under § 43.10(c), the FAA requires each person who removes a life-limited part from a type-certificated product to ensure that the part is controlled using one of the following methods:

1. *Record keeping system.* The part may be controlled using a record keeping system that substantiates the part number, serial number, and current life status of the part. Each time the part is removed from a type-certificated product, the record must be updated with the current life status. This system may include electronic, paper, or other means of record keeping.
2. *Tag or record attached to part.* A tag or other record may be attached to the part. The tag or record must include the part number, serial number, and current life status of the part. Each time the part is removed from a type-certificated product, either a new tag or record must be created, or the existing tag or record must be updated with the current life status.
3. *Non-permanent marking.* The part may be legibly marked using a non-permanent method showing its current life status. The life status must be updated each time the part is removed from a type-certificated product, or if the mark is removed,

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- another method in this section may be used. The mark must be accomplished in accordance with the instructions under § 45.16 of this chapter in order to maintain the integrity of the part.
4. *Permanent marking.* The part may be legibly marked using a permanent method showing its current life status. The life status must be updated each time the part is removed from a type-certificated product. Unless the part is permanently removed from use on type certificated products, this permanent mark must be accomplished in accordance with the instructions under § 45.16 of this chapter in order to maintain the integrity of the part.
 5. *Segregation.* The part may be segregated using methods that deter its installation on a type-certificated product. These methods must include, at least, maintaining a record of the part number, serial number, and current life status, and ensuring the part is physically stored separately from parts that are currently eligible for installation.
 6. *Mutilation.* The part may be mutilated to deter its installation in a type certificated product. The mutilation must render the part beyond repair and incapable of being reworked to appear to be airworthy.
 7. *Other methods.* Any other method approved or accepted by the FAA.

Requiring such control all aircraft maintenance providers to determine if a life-limited part, that is removed from an aircraft and is intended to be reinstalled, has reached its life-limit or if there is still time remaining and the part is eligible to be re-installed on an aircraft. The part may be at the end of its life limit and not eligible for installation. Or the part may not have reached the end of its life limit but is so close that reinstallation would not be practicable. In these cases, industry practices vary. For instance, the part might be put in a bin and later sold as scrap metal, it might be used as a training aid, or it might be mutilated.

When life-limited parts are temporarily removed and reinstalled for the purpose of performing maintenance, no disposition is required if (1) life status of the part has not changed; (2) Removal and reinstallation is performed on the same serial numbered product; (3) The product does not accumulate time in service while the part is removed. The recording and recordkeeping action method(s) must deter the installation of the part after it has reached its life limit. This collection requires recordkeeping, tagging or marking of parts removed or installed on type certificated products or deterrence for installation on type certificated products.

It is **mandatory** for respondents to comply with at least one of the recordkeeping requirements put forth in § 45.10(c). The collection frequency is on an **as-needed** basis; it must occur whenever a maintenance provider removes the life-limited part from an aircraft.

Respondents to this recordkeeping requirement are aircraft maintenance providers. These consist of certificated mechanics and repairmen, FAA-certificated air carriers, and FAA-certificated repair stations.

Reporting Requirements covered under this IC include:

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Under § 45.16, when requested by a person required to comply with § 43.10 of this chapter, the holder of a type certificate or design approval for a life-limited part must provide marking instructions or must state that the part cannot be practicably marked without compromising its integrity.

It is **mandatory** for respondents to comply with the information reporting requirements put forth in § 45.16. The collection frequency is on an **as-needed** basis; it must occur whenever a request is made by a person required to comply with § 43.10. A maintenance provider who is the person removing the life-limited part is the person who receives the information.

Respondents to this reporting requirement are certificate or design approval holders and include Type Certificate holders and holders of Parts Manufacturing Approvals (PMA) and Technical Standard Orders (TSO).

For both the reporting and recordkeeping collections, aircraft maintenance providers are also who would receive the information. Aircraft maintenance providers must appropriately disposition (i.e., record accurate time-life information for each part that has a life-limit), so that other aircraft maintenance providers have that information to make a determination of whether that part can be reinstalled on another aircraft, or is the parts life-limit is reached, so the part can be removed from the aircraft and properly disposed of.

This collection of information supports the Department of Transportation's strategic goal on safety.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

This collection permits the use of electronic recordkeeping for tracking of documents. In compliance with the Government Paperwork Elimination Act (GPEA), electronic recordkeeping is available and is presently utilized by most aircraft operators and repair facilities. The electronic recordkeeping burden makes up 70% of the burden associated with this collection.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

This information collection is not a duplication of other reporting. No other Federal Agency requires recordkeeping or reporting related to life-limited aircraft parts.

5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.

The reporting and recordkeeping required under this collection is the minimum information needed for the FAA to ensure appropriate disposition of life-limited aircraft parts. No exception is provided to any respondent, including small businesses, from providing the required

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information. The FAA does not have any alternative method to offer to small businesses to minimize burden associated with submitting the required information.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The information is reported and/or retained on an as-needed basis. To collect it less often would be to not collect it at all. As previously discussed, if the collection was not conducted, aircraft maintenance providers would be unable to verify the status of life-limited aircraft parts. This could result in unairworthy parts being installed on aircraft operating in the NAS, and aircraft accidents occurring as a result.

7. Explain any special circumstances.

There are no special circumstances related to this information collection.

The information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2)(i)-(viii).

8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A 60-day Federal Register Notice was published in the Federal Register on March 14, 2024 (89 FR 18700). Comments were due by May 13, 2024. No comments were received.

The FAA's Aircraft Maintenance Division has responsibility for Part 43 regulations and guidance, and has a correspondence inbox 9-AWA-AFS-300-MAINTENANCE@FAA.GOV, for the purpose of receiving feedback from stakeholders. No feedback relating to information collection burden has been received.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

No gifts or payments are provided to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.

There is no assurance of confidentiality provided to respondents.

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11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

This information collection does not collect information of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

Burden Summary

The FAA estimates that the total burden for the safe disposition of life-limited parts is **53,500** hours and \$3,776,890. There are **22,000** total respondents with a total of **114,000** responses annually.

Safe Disposition of Life-Limited Parts	§ 43.10 Recordkeeping Burden	§ 45.16 Reporting Burden	Total
# of Respondents (annually)	8000	14,000	22,000
Responses per respondent	12.5	1	--
Total # of Responses	100,000	14,000	114,000
Time per Response (hours)	.5	.25	--
Hour Burden (hours)	50,000	3,500	53,500
Cost Burden (\$)	3,607,000	169,890	3,776,890

Section 43.10 Recordkeeping Burden.

As discussed in Question 2 above, each person who removes a life-limited part from a type-certificated product must ensure that the part is controlled using one of the methods. Respondents to this collection include aircraft maintenance providers, such as mechanics and repairmen, FAA-certificated repair stations, and FAA-certificated air carriers.

The FAA estimates that each respondent provides 12.5 responses each year. This is an average; some respondents do more, while some do less.

The FAA estimates there are approximately **8000** respondents to this collection. The FAA estimated the number of respondents based on the total number of active certificate holders. Because not all maintenance providers work on aircraft that have life limited parts, some of the group estimates were calculated using a portion of those certificate holders:

- Part 91K, 121 and 121/135 respondents were not devalued since these groups typically always have aircraft having life limited parts.
- Of the almost 5000 repair stations, the FAA estimates 2500 of those are working on aircraft/engines that have life-limited parts.
- Of the 330,000 mechanics, the FAA estimates approximately 5000 of those individuals working on aircraft with life-limited parts. Note: This estimate is intended to NOT

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duplicate mechanics who are employed and/or performing work for air carriers and repair stations. For the same reasons, repairmen numbers were not included in these estimates.

CFR Part	# of Active	# Estimated Respondents to this Collection
145	4938	2500
121	57	57
135	1833	200
121/135	6	6
91K	10	10
65	329,156	5000
Total		7763

Summary of § 43.10 Recordkeeping Burden	
# of Respondents (annually)	8000
Responses per respondent	12.5
Total # of Responses	100,000
Time per Response (hours)	.5
Hour Burden (hours)	50,000
Cost/hour	\$72.14
Cost Burden (\$)	3,607,000

Labor Cost Analysis

The FAA estimates that mechanics are the primary persons meeting the requirements of 43.10 for the disposition of life-limited parts. The wage rate of \$36.07 per hour came from the Department of Labor, Bureau of Labor Statistics (BLS), May 2023, Aircraft Mechanics and Service Technicians 49-3011.¹ The median hourly wage rate is used to calculate a fully burden labor cost of **\$72.14**.

Mechanics			
Hourly wage	31% Fringe Benefit	69% Overhead	Total
\$36.07	\$11.18	\$24.89	\$72.14

Section 45.16 Reporting Burden

As previously discussed in Question 2 above, under § 45.16, when requested by a person required to comply with § 43.10 of this chapter, the holder of a type certificate or design approval for a life-limited part must provide marking instructions or must state that the part cannot be practicably marked without compromising its integrity. Respondents to this collection include holders of a type certificate or design approval for a life-limited part.

¹ U.S. DOL/BLS: <https://www.bls.gov/oes/current/oes493011.htm>

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The FAA estimates that each respondent provides 1 response each year. This is an average; some respondents do more, while some do none.

The FAA estimates there are approximately **14,000** respondents to this collection. The FAA estimated the number of respondents based on the total number of type certificate and design approval holders. The FAA estimates only 1% of design holders Because not all type certificates or design approval incorporate life limited parts.

Design Type	# of Design Approvals	# Estimated Respondents to this Collection (1% Approvals)
TCs	2217	22
PMA	1,367,177	13,671
TSO	6985	70
STC	48312	482
Total		14,245

Summary of § 45.16 Reporting Burden	
# of Respondents (annually)	14,000
Responses per respondent	1
Total # of Responses	14,000
Time per Response (hours)	.25
Hour Burden (hours)	3500
Cost/Hour	\$48.54
Cost Burden (\$)	169,890

Labor Cost Analysis

The FAA estimates that design holder personnel are the primary persons meeting the requirements of § 45.16 for providing information on requests for parts marking. The wage rate of **\$21.06** per hour came from the Department of Labor, Bureau of Labor Statistics (BLS), May 2023, Installation, Maintenance, and Repair Workers, All Other, 49-9099.²

Design Holder Employees			
Hourly wage	31% Fringe Benefit	69% Overhead	Total
\$24.27	\$7.52	\$16.75	\$48.54

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information.

The FAA recognizes that there may be information technology and operation and maintenance costs associated with recordkeeping for this information collection. The respondents to this collection are already required to maintain records associated with the performance of

² U.S. DOL/BLS: <https://www.bls.gov/oes/current/oes499099.htm>

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maintenance on aircraft regulated under 14 CFR. Therefore, the FAA finds there are no additional material costs associated with this collection.

14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

There is no cost to the Federal Government related to this information collection. The FAA does not review the records made by maintenance providers or design holders except when reviewing aircraft maintenance records required by part 43. The cost to the government for reviewing aircraft maintenance records required to be made under part 43 is estimated in IC 2120-0020.

15. Explain the reasons for any program changes or adjustments.

The estimates in this information collection summary have increased due to the following:

- Updated estimates to the number of respondents to the collection
- Adding the 45.16 burden to the information request. The burden associated with this regulation was inadvertently missed in previous requests.
- Wage rates for respondents have been updated.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

No collections of information results are to be published.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

The FAA is not seeking approval to *not* display expiration date for OMB.

18. Explain each exception to the topics of the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”

There are no exceptions.